

UNITED STATES DISTRICT COURT

for the
Southern District of Illinois

FILED

APR 23 2014

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

Donald P. Webb Sr

Plaintiff
v.
Pearson Bush

Brenda Webb

Defendant(s)

Case Number:

14-CV-469 DRH-
(Clerk's Office will provide) DGW

PRO SE CIVIL RIGHTS COMPLAINT
(Non-Prisoner)

I. JURISDICTION

Subject matter jurisdiction is invoked under 28 U.S.C. § 1331, 28 U.S.C. § 1343(a)(3), and/or 42 U.S.C. § 1983. List any additional bases for federal subject matter jurisdiction here: Vexatious litigation, Abuse of process, Abuse of Discovery
and unreasonable proceedings

II. PARTIES

Plaintiff:

A. Plaintiff, a citizen of Illinois (state), who resides at
1409 North 54th st Washington Park IL, alleges that his/her
civil rights were violated by the individual(s) named below.

Defendant #1:

B. Defendant Pearson Bush is employed as
(a) (Name of First Defendant)
Attorney for Mrs Webb
(b) (Position/Title)

with Pearson Bush Law Office, 523 Missouri Ave East Louis
(c) (Employer's Name and Address)

Illinois 62202

At the time the claim(s) alleged this complaint arose, was Defendant #1 employed by the state, local, or federal government? ☐ Yes ☒ No

If your answer is YES, briefly explain:

Check one of the following:

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Defendant #2:

C. Defendant Brenda R. Webb is employed as
(Name of Second Defendant)

Clerk

(Position/Title)

with H & R Block - East St Louis, Ill
(Employer's Name and Address)

2500 State St. 62202

At the time the claim(s) alleged in this complaint arose, was Defendant #2 employed by the state, local, or federal government? ☐ Yes ☒ No

If you answer is YES, briefly explain:

Check one of the following:

☒ This defendant **personally participated** in causing my injury, and I want **money damages**.

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Defendant #3:

D. Defendant _____ is employed as
(Name of Third Defendant)

(Position/Title)

with _____
(Employer's Name and Address)

At the time the claim(s) alleged in this complaint arose, was Defendant #3 employed by the state, local, or federal government? ☐ Yes ☐ No

If you answer is YES, briefly explain:

Check one of the following:

☐ This defendant **personally participated** in causing my injury, and I want **money damages**.

☐ The **policy or custom** of this official's government agency violates my rights, and I seek **injunctive relief** (to stop or require someone to something).

Additional Defendant(s) (if any):

E. Using the outline set forth above, identify any additional Defendant(s), using additional pages, if necessary.

III. PREVIOUS LAWSUITS

A. Have you begun any other lawsuits in this federal court?

☐ Yes ☐ No

B. If your answer to "A" is YES, describe each lawsuit in the space below. If there is more than one lawsuit, you must describe the additional lawsuits on another sheet of paper using the same outline.

1. Parties to previous lawsuits:

Plaintiff(s):

Defendant(s):

2. Case number:

3. Name of Judge to whom case was assigned:

4. Disposition of case (for example: Was the case dismissed? Was it appealed? Is it still pending?):

IV. STATEMENT OF CLAIM

State here, as briefly as possible, when, where, how, and by whom you feel your constitutional rights were violated. Do not include legal arguments or citations. If you wish to present legal arguments or citations, file a separate memorandum of law. If you intend to allege several related claims, number and set forth each claim in a separate paragraph.

- ① In multiple court proceeding without Discovery, Informed Consent of parties Involved, Attorneys Bush and Brenda Webb filed motions.
- ② Mrs Webb does not have guardianship or power of Attorney over the person she seeks support for.
- ③ Mr Webb has been subjected to vexatious litigation over and over for at least fifteen years, and three in the past two years.
- ④ Mr Bush and Mrs Webb have engaged in abusive discovery and have not presented any evidence to support them in motions or trial.
- ⑤ Mrs Webb and Mr Bush have been untruthful in their motions and claims.
- ⑥ Mrs Webb has not abided by any agreement signed in court for the last two years.

V. REQUEST FOR RELIEF (check as many boxes as appropriate)

Plaintiff requests that the court grant the following relief:

Compensatory damages in the amount of \$ 75,000.

Punitive damages in the amount of \$ 750,000.

An ordering requiring defendant(s) to:

enjoin them from seeking further support and cease and desist the malicious abuse of process and harassment

A declaration that:

cites both Lawyer and Client for Contempt and on up to disbarment and relief that the Court Deems proper.

Other:

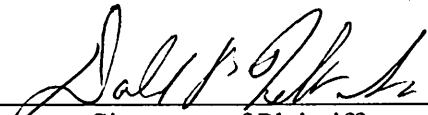
VI. JURY DEMAND (check one box below)

Plaintiff ☒ does or ☐ does not request a trial by jury.

DECLARATION UNDER FEDERAL RULE OF CIVIL PROCEDURE 11

I certify to the best of my knowledge, information, and belief, that this complaint is in full compliance with Rule 11(a) and 11(b) of the Federal Rules of Civil Procedure. The undersigned also recognizes that failure to comply with Rule 11 may result in sanctions.

Signed on: 4. 23. 2014
(date)


Signature of Plaintiff

1409 North 54th
Street Address

Donald P. Webb Sr.
Printed Name

Washington Park FL 32204
City, State, Zip